

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

1. The date by which the respondent, United States of America (respondent) is required to answer in the above-captioned matter is October 24, 2010.
2. Respondent is seeking from the Internal Revenue Service (IRS) additional records to complete its answer.
3. The parties have stipulated to a continuance for respondent to answer to December 15, 2010.
4. The Court has scheduled a Case Management Conference in this matter on November 19, 2010. The parties wish an opportunity to review the expected IRS materials to determine whether they may resolve this matter without further litigation.
5. Accordingly, the parties also stipulate to the continuance of the Case Management Conference to January 21, 2011 with a joint Case Management Conference Statement due by January 14, 2011.

MELINDA HAAG  
United States Attorney

Dated: October 25, 2010

/s/ Blake D. Stamm  
BLAKE D. STAMM  
Assistant United States Attorney  
Tax Division  
Attorneys for United States of America

Dated: October 25, 2010

/s/ John Gigounas  
John Gigounas  
Attorney for Plaintiffs

**PROPOSED ORDER**

In accordance with the parties' stipulation:

A. The government shall not file its answer in the the above-captioned matter later than December 15, 2010;

**Case Management**  
B. The ~~Settlement~~ Conference in this matter is continued until January 21, 2011 and a joint Case Management Conference Statement shall be due by January 14, 2011.

IT IS SO ORDERED.

Dated: October 26, 2010

